

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 04-40113-FDS

ELIZABETH R. STEFFENBERG,)	(BBO#639293)
Plaintiff,)	
)	
v.)	
)	
T. GENE GILMAN, STEVEN GILMAN,)	
THE GILMAN INSURANCE)	
AGENCY, INC., DAVID M. SCOLL,)	
ARBOR SECURITIES, LTD.,)	
ALLIANCE INVESTMENT)	
MANAGEMENT, COMMONWEALTH)	
FINANCIAL HOLDINGS INC.,)	
FINANCIAL LINKS, INC.,)	
T. GILMAN & CO., LTD.,)	
FIRST ALLIED SECURITIES, INC.,)	
PENSON FINANCIAL SERVICES, INC.,)	
AVIVA USA CORPORATION,)	
TRADETEK, LTD., and)	
TRADETEK, LLC,)	
Defendants.)	

**MOTION TO COMPEL RESPONSES OF DEFENDANT DAVID M. SCOLL TO
PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff, Elizabeth R. Steffenberg ("Mrs. Steffenberg"), hereby moves for an Order compelling Defendant, David M. Scoll ("Attorney Scoll"), to provide responsive documents to certain requests set forth in Mrs. Steffenberg's First Request for Production of Documents to Defendant, David M. Scoll.

In further support of this Motion, Mrs. Steffenberg relies on her Memorandum of Law and the Affidavit of Louis M. Ciavarra, Esquire, filed herewith.

Respectfully submitted,

ELIZABETH R. STEFFENBERG,
By Her Attorneys,

C. Steen S. Collins
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Christine S. Collins, Esquire (BBO #639293)
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Date: August 27, 2004

CERTIFICATE OF SERVICE

I, Christine S. Collins, attorney for the Plaintiff, hereby certify that I have served a copy of the foregoing on the following by mailing a copy of same, via first-class mail, postage prepaid, this 27th day of August 2004 to all parties and counsel of record.

Christine S. Collins
Christine S. Collins